

Troutman Pepper Hamilton Sanders LLP  
5 Park Plaza, Suite 1400  
Irvine, CA 92614-2545  
troutman.com



May 5, 2023 (VIA ECF)  
Honorable Philip M. Halpern  
300 Quorropas Street  
White Plains, New York 10601-4150

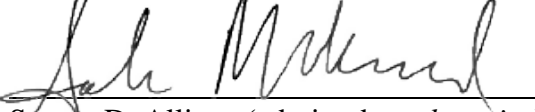
***Re: Delux Public Charter, LLC, et al. v. County of Westchester, et al. (Index No. 22-cv-01930)***  
**Application For Enlargement Of Rule 56.1 Statement Or, In The Alternative, An Order That Each Party Have Equal Space**

Dear Judge Halpern:

Earlier today, the County filed a revised Joint Rule 56.1 Statement (the “Statement”) that is roughly twenty-seven pages, exclusive of the signature block. The County’s portion of the Statement is roughly 14 3/4 pages, inclusive of the caption, while Plaintiffs’ portion (including its Counterstatement of Facts) is roughly 12 pages. Rather than burdening the Court by responding to the County’s characterizations of the parties’ efforts on the Statement in the County’s own Application, Plaintiffs request the following:

Given the complex issues involved in this case, Plaintiffs respectfully request that the Court grant an additional two pages for the Statement and accept the Statement as filed by the County. Plaintiffs in good faith revised and honed their responses to the County’s facts and included only those facts in its Counterstatement of Facts that are “required to address facts applicable to claims for relief or defenses.” (ECF No. 90). Alternatively, Plaintiffs request that the Court order an even division (12.5) of pages to each party for the Statement.

Respectfully submitted,



Steven D. Allison (admitted *pro hac vice*)  
Samrah R. Mahmoud (admitted *pro hac vice*)

cc: Counsel of Record (via CM/ECF)